

As a recently licensed and active Amateur Extra Class operator, I am generally in favor of the restructuring proposal by the ARRL, with two major exceptions. The first is that the proposed frequency allocations for the proposed Novice sub-bands are too wide. If the purpose of the Amateur Service is to attract and develop a pool of skilled and motivated people to provide communications in support of Public Safety and National Defense, making the Novice sub-band apportionment almost as wide as the General and Extra sub-bands greatly reduces the motivation to improve skills by progressing through the license classes. In my opinion, the Novice frequency allocation should probably be only one-quarter the size proposed by the ARRL.

Second, and for similar reasons, I am opposed to removing frequency allocation from the CW portion of the bands and reallocating it to the phone portion of the bands. I believe that there is merit in being able to operate in CW Mode, and that the inducement to learn the Morse Code in order to have access to the CW portion of the bands is a positive benefit to the Amateur Service. Learning and using the Morse Code requires determination and discipline, both of which have traditionally been hallmarks of the Amateur Service, and which have set it apart from the other, unlicensed services. If the response to crowded phone sub-band conditions is simply to take space from the CW sub-bands, there will be less inducement to learn new and valuable skills.

Thank you for the opportunity to comment on the ARRL petition.